

**IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA**

STEWART ABRAMSON and JAMES EVERETT SHELTON, individually and on behalf of a class of all persons and entities similarly situated,

*Plaintiffs,*

MONICA ABOUD, individually and on behalf of all others similarly situated,

*Plaintiff-Intervenor,*

v.

AGENTRA, LLC, ANGELIC MARKETING GROUP L.L.C., and MATTHEW JONES,

*Defendants.*

Case No. 2:18-cv-00615-PLD

**CLASS ACTION**

**DEFENDANT AGENTRA, LLC'S RESPONSE TO  
PLAINTIFF-INTERVENOR MONICA ABOUD'S  
MOTION TO INTERVENE AND TO MODIFY PROTECTIVE ORDER**

Defendant Agentra, LLC (“Defendant” or “Agentra”) respectfully submits this Response to Plaintiff-Intervenor Monica Abboud’s (“Plaintiff-Intervenor” or “Abboud”) Motion to Intervene and to Modify Protective Order [Dkt. 128]. This Response is based on the exhibits attached hereto and the concurrently filed Brief in Support of Defendant’s Response to Motion to Intervene and to Modify Protective Order.

Dated: November 12, 2020

Respectfully submitted,

/s/ William S. Richmond

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**COUNSEL FOR DEFENDANT  
AGENTRA, LLC**

**CERTIFICATE OF SERVICE**

The undersigned counsel for Agentra does certify that he served this pleading on all counsel of record by electronic filing on November 12, 2020 through the CM/ECF system.

/s/ William S. Richmond